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**Pro Hac Vice Applications Forthcoming*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANE DOE,

Plaintiff,

v.

JOSEPH LOMBARDO, Governor of Nevada
in his official capacity; AARON FORD,
Attorney General of Nevada in his official
capacity; NYE COUNTY; ELKO COUNTY;
STOREY COUNTY; WESTERN BEST, INC,
D/B/A CHICKEN RANCH; WESTERN BEST,
LLC; DESERT ROSE CLUB, LLC;
HACIENDA ROOMING HOUSE, INC. D/B/A
BELLA'S HACIENDA RANCH; MUSTANG
RANCH PRODUCTIONS, LLC D/B/A
MUSTANG RANCH LOUNGE, LLC; AND
LEONARD "LANCE" GILMAN in his official
capacity,

Defendants.

CASE NO.: 3:24-cv-00065-MMD-CSD

**STIPULATION AND ORDER TO
STAY DISCOVERY DEADLINES
PENDING COURT'S DISPOSITION
AS TO UNRESOLVED DISPOSITIVE
MOTIONS**

[FIRST REQUEST]

COMES NOW Plaintiff Jane Doe, by and through her counsel of record, and Defendants Joseph Lombardo and Aaron Ford (“State Defendants”), Defendants Nye County, Elko County, and Storey County (“County Defendants”) by and through their counsel of record, Defendant Desert Rose Club, LLC, Mustang Ranch Productions, LLC and Leonard “Lance” Gilman, by and through their counsel of record, Western Best, Inc. d/b/a Chicken Ranch, and Western Best, LLC by and through their counsel of record and hereby stipulate and agree to the following regarding staying the discovery deadlines in this case.

1. On February 25, 2024, County Defendants filed a Motion to Dismiss [ECF No. 5]. This matter has been fully briefed and is pending this Court’s decision.
2. On February 29, 2024, Defendants Mustang Ranch Productions, LLC and Leonard “Lance” Gilman filed a Motion to Dismiss [ECF No. 6] and filed a joinder to [ECF No. 5]. This matter has been fully briefed and is pending this Court’s decision.
3. On April 1, 2024, State Defendants filed a Motion to Dismiss [ECF No. 24]. The briefing in this matter is not yet complete, and is therefore still pending the Court’s decision.
4. On April 2, 2024, Defendants Mustang Ranch Productions, LLC and Leonard “Lance” Gilman filed a joinder to [ECF No. 24] and [ECF No. 36].
5. On April 2, 2024, State Defendants filed a Motion to Stay Discovery [ECF No. 30]. Rather than responding to this motion, Plaintiff has prepared this instant stipulation.
6. Also, on April 2, 2024, Defendant Desert Rose Club, LLC filed joinders to [ECF No. 5], [ECF No. 6], [ECF No.16] and [ECF No. 18].
7. On April 12, 2024, County Defendants filed a Motion to Dismiss [ECF No. 43]. This matter has been fully briefed and is pending the Court’s decision.
8. In an effort to maintain judicial economy, the parties agree to stay discovery deadlines until this Court has adjudicated the above dispositive motions.

IT IS SO STIPULATED.

DATED this 8th day of May, 2024.**AARON FORD**
Attorney General*/s/ Iva K. Todorova*

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*Attorneys for Governor Joseph Lombardo
and Attorney General Aaron Ford*DATED this 7th day of May, 2024.**GUINASSO LAW, LTD.***/s/ Jason D. Guinasso, Esq.*

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DATED this 7th day of May, 2024.**ERICKSON THORPE & SWAINSTON,
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<p>DATED this 8th day of May, 2024.</p> <p>GUNDERSON LAW FIRM</p> <p><i>/s/ Courtney Sweet</i></p> <hr/> <p>Courtney Sweet Nevada Bar No. 3895 Warren Way Reno, NV 89509 csweet@gundersonlaw.com</p> <p><i>Attorneys for Defendants Mustang Ranch Productions, LLC and Leonard "Lance" Gilman</i></p>	<p>DATED this 8th day of May, 2024.</p> <p>THE OMARA LAW FIRM, P.C.</p> <p><i>/s/ David C. O'Mara</i></p> <hr/> <p>David C. O'Mara Nevada Bar No. 311 E. Liberty Street Reno, NV 89501 david@omaralaw.net</p> <p><i>Attorneys for Defendant Desert Rose Club, LLC</i></p>
<p>DATED this 9th day of May, 2024.</p> <p>FOX ROTHSCHILD LLP</p> <p><i>/s/ Deanna L. Forbush</i></p> <hr/> <p>DEANNA L. FORBUSH (6649) REX D. GARNER (9401) 1980 Festival Plaza Drive, Ste. 700 Las Vegas, Nevada 89135 dforush@foxrothschild.com <i>Attorneys for Western Best, Inc. d/b/a Chicken Ranch Western Best, LLC</i></p>	

ORDER

IT IS HEREBY ORDERED discovery deadlines shall be stayed until this Court has adjudicated the above dispositive motions.

IT IS SO ORDERED this 13th day of May, 2024.


 UNITED STATES MAGISTRATE JUDGE